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**From:** Lazos, Pamela [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=15D4F11C6327474BB424A24CBD406E93-PLAZOS]  
**Sent:** 7/1/2021 9:09:46 PM  
**To:** Rivera, Nina [Rivera.Nina@epa.gov]  
**Subject:** RE: CRW - CD Modification

Good point, and we did it that way because it caused the least disturbance to the framework of the CD. You can't tell from looking at the redline, but we did try to leave as much in place as we could so there would be less language to negotiate. DOJ didn't even want to make wordsmithing changes for that reason so I'm going to guess that they won't want to move that section front and center. The good news is there are two whole appendices devoted to the improvements.

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**From:** Rivera, Nina <Rivera.Nina@epa.gov>  
**Sent:** Thursday, July 01, 2021 5:01 PM  
**To:** Lazos, Pamela <Lazos.Pamela@epa.gov>  
**Subject:** RE: CRW - CD Modification

Only a couple of minor edits, and a number of comments mostly asking whether CRW had not yet completed

## Ex. 5 Deliberative Process (DP)

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**From:** Lazos, Pamela <Lazos.Pamela@epa.gov>  
**Sent:** Tuesday, June 29, 2021 2:06 PM  
**To:** Rivera, Nina <Rivera.Nina@epa.gov>  
**Subject:** FW: CRW - CD Modification

Woop woop woop woop!

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**From:** Ahearn, Devon (ENRD) <Devon.Ahearn@usdoj.gov>  
**Sent:** Tuesday, June 29, 2021 1:20 PM  
**To:** Andes, Fredric <Fredric.Andes@btlaw.com>  
**Cc:** Levine, Bradley (ENRD) <Bradley.Levine@usdoj.gov>; Nanda, Sushila <Nanda.Sushila@epa.gov>; Lazos, Pamela <Lazos.Pamela@epa.gov>; Williams, Janna <jannwillia@pa.gov>; Herb, Dawn <dherb@pa.gov>  
**Subject:** CRW - CD Modification

*Confidential Settlement Communication – Subject to FRE 408*

Fred,

I have attached a proposed Modification to the 2015 Consent Decree for CRW's review. I have also attached a redline that compares the Modification to the version of the Decree that we filed in 2015. Where appropriate, we have removed or modified provisions to bring the document up to date—those edits are reflected in the redline. You'll also see a number of comments/questions for discussion. To that end, we would like to schedule a virtual meeting with CRW within the next 2-3 weeks. Please let me know what dates/times work well for your team and we will schedule the meeting.

We look forward to hearing back from you. Please don't hesitate to reach out with any questions in the meantime.

Thanks,

Devon

Devon Ahearn

Trial Attorney

Environmental Enforcement Section | ENRD | U.S. Department of Justice

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